

CLIFTON POWER COMPANY

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June 8, 2021

Chairman Justin T. Williams
The Public Service Commission of SC
101 Executive Center Dr, Suite 100
Columbia, South Carolina 29210

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PSCSC
Clerks Office

RE: Electric Vehicle Charging Stations (EVCS)

VIA; USPS and Email: contact@psc.sc.gov

Dear Chairman Williams :

Clifton Power Company manufactures and installs electric vehicle charging stations (EVCS). These stations are or will be located at various locations throughout the State in service areas that are assigned to various utilities that may (e.g. Duke Energy and Dominion Energy) or may not (e.g. Santee Cooper and associated cooperatives) be under the Commission's jurisdiction..

Typical locations will be at offices, restaurants, retail establishments (e.g. malls & stores), factories or other locations when the vehicles may be recharged while the driver/passenger is nearby.

At some locations, the power is purchased from the grid and the power is delivered and resold to recharge vehicles.

In other cases, the power and energy are manufactured¹ at the recharging site, or nearby, and delivered and sold to recharge vehicles.

Given the current South Carolina statutes and regulations, please advise Clifton Power on the Commission's position regarding its jurisdiction on:

1. the manufacturing, siting, developing, installing, commissioning and/or operating the electric vehicle charging stations by other than regulated utilities
 - a. when the power and energy are supplied, directly or indirectly, by a regulated utility; and
 - b. when the power and energy are supplied, directly or indirectly, by a Commission unregulated entity.
2. if the power and energy are supplied to the charging station only after being "treated²" - for example with a battery - does that have any impact to the Commission's jurisdiction;
3. if the charging stations deliver energy and power at any frequency other than 60 AC Hz or DC power, does the Commission have any jurisdiction; and
4. if the EVCS changes the characteristics of the power in any way, does the Commission have jurisdiction?

¹/ Some facilities will be qualifying small power production facilities and qualifying cogeneration facilities under PURPA (Public Utility Regulatory Policies Act (PURPA, Pub.L. 95-617) while others may not.

²/ For example, if the power and energy has been stored in a battery or other devise, and is them supplied, what jusisdiction does the Commission over the EVCS.

Please advise us with regard to these jurisdictional issues at the earliest possible time.

Also, please advise us if we need to file with the Commission in any other manner.

Sincerely,

Charles B. Mierek

Mr. Charles B. Mierek, P.E.
President and Managing Director
CLIFTON POWER COMPANY

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